

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: STEEL ANTITRUST
LITIGATION**

Case No. 08-cv-5214

Honorable James B. Zagel

**THIS DOCUMENT RELATES TO ALL
DIRECT PURCHASER ACTIONS:**

Standard Iron Works v. ArcelorMittal, et al.,
Case No. 08-cv-5214

Wilmington Steel Processing Co., Inc. v.
ArcelorMittal, et al., **Case No. 08-cv-5371**

Capow, Inc. d/b/a Eastern States Steel v.
ArcelorMittal, et al., **Case No. 08-cv-5633**

Alco Industries, Inc. v. ArcelorMittal, et al.,
Case No. 08-cv-6197

Gulf Stream Builders Supply, Inc. v.
ArcelorMittal, et al., **Case No. 10-cv-4236**

**CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND
INCENTIVE AWARDS FOR CLASS REPRESENTATIVES**

Class Counsel respectfully move this Court for an order (i) awarding Class Counsel attorneys' fees equal to 33% of the \$30 million common settlement funds recovered from Defendants Nucor Corporation, Steel Dynamics, Inc. and SSAB Swedish Steel Corporation; (ii) awarding reimbursement of \$465,602.62 in litigation costs and expenses; (iii) awarding incentive payments of \$50,000 to each of the five class representatives, and (iv) directing Co-Lead

Counsel to distribute attorneys' fees in a manner that, in the opinion of Co-Lead Class Counsel, fairly compensates each firm in view of its contribution to the prosecution of Plaintiffs' claims.

In support of this Motion, Class Counsel submit their accompanying Memorandum of Law, filed herewith, and incorporate by reference the facts and legal arguments set forth in the Memorandum of Law and accompanying exhibits.

Settling Defendants do not oppose this motion.

WHEREFORE, and for the reasons in the Memorandum of Law, Class Counsel respectfully request that the Court issue an Order awarding Class Counsel 33% of the \$30 million common settlement fund as a fair and reasonable attorney fee; awarding Class Counsel reimbursement of \$465,602.62 in litigation costs and expenses; awarding incentive payments to each of the class representatives in the amount of \$50,000, and directing Co-Lead Counsel to allocate the attorneys' fee award in a reasonable manner consistent with Co-Lead Counsel's assessment of each firm's contribution to the prosecution of the case.

Dated: December 5, 2016

Respectfully submitted,

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Co-Lead Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2016, I caused a true and correct copy of the foregoing **Motion for Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Incentive Awards for Class Representatives** to be filed and served electronically via the Court's CM/ECF system upon all registered users.

/s/ Jeffrey S. Istvan
Jeffrey S. Istvan